

{In Archive} Re: Permitting Questions

Eric Byous to: Carol Hutchings

Cc: Elizabeth Janes

From: Eric Byous/R9/USEPA/US

To: Carol Hutchings/ENF/R8/USEPA/US@EPA,

Cc: Elizabeth Janes/R9/USEPA/US

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## Hi Carol,

I believe the operator of the facility should apply for the permit [144.31(b)], but the permit can apply to both the owner and operator. For signing application, reports, etc., it can also be a "principle exec. officer" [144.32(a)(3)].

Do you want to prevent prions from getting to the drainfield, or make sure the tank is pumped when needed? Within the permit, you can definitely monitor the sludge and scum levels in the tank and require pumping when sludge + scum = X level of the tank . If you want to make sure prions aren't discharged to the drainfield, you can require sampling and/or disinfecting after the tank and prior to the drainfield. If the prion source is known and able to be isolated, you can prohibit prions from entering the injection well's collection system altogether.

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Eric Byous 415.972.3531 fax: 415.947.3549 USEPA, Region 9 Ground Water Office (WTR-9) 75 Hawthorne St., San Francisco, CA 94105 http://www.epa.gov/region09/water/groundwater/uic.html

Elizabeth Janes/R9/USEPA/US



Elizabeth Janes/R9/USEPA/US 03/18/2005 02:42 PM

To Carol Hutchings/ENF/R8/USEPA/US@EPA

03/21/2005 08:52 AM

cc Eric Byous/R9/USEPA/US@EPA

Subject Re: Permitting Questions

Hi Carol: I haven't been involved in permitting of large capacity septic systems nor specifically of animal manure/prion waste. I went with Douglas Minter to an onsite sewage meeting last week where it turned out there was only one EPA-issued permit for a large capacity septic, by Eric Byous here in Region 9. It is attached below, and Eric if you could more directly respond to Carol's questions, please cc: me.

I would ask ORD for consultation on the cost of the prion "disinfectants" vs. their impact on beneficial bacteria in the tank vs. the likelihood of prion transport beyond primary treatment/septic tank, provided x amount of detention time. Is this the lab that needs the permit? http://www.cvmbs.colostate.edu/aphi/about/aphilab.html



## Carol Hutchings



To: Elizabeth Janes/R9/USEPA/US@EPA

cc: Subject: Permitting Questions

